

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 11
	§	
KRISJENN RANCH, LLC, KRISJENN LLC - SERIES UVALDE RANCH, KRISJENN RANCH, LLC - SERIES PIPELINE ROW	§ § § § § § §	CASE NO. 20-50805 RANCH,
DEBTORS	§	

**MOTION REQUESTING EXPEDITED CONSIDERATION OF DEBTORS'
AGREED MOTION TO MODIFY CASH COLLATERAL ORDER**

**DEBTOR HAS REQUESTED EXPEDITED CONSIDERATION OF THIS MOTION AND
HAS REQUESTED THAT A HEARING BE HELD ON THIS MOTION AT THE
COURT'S EARLIEST CONVENIENCE. IF THE COURT IN FACT SETS THIS
MOTION FOR AN EXPEDITED HEARING, THEN ONLY ATTENDANCE AT THE
HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

KrisJenn Ranch, LLC ("KJR"), KrisJenn Ranch, LLC - Series Uvalde Ranch ("KJR-Ranch"), and KrisJenn Ranch, LLC - Series Pipeline ROW ("KJR-ROW"; and KJR, KJR-Ranch, and KJR-ROW (collectively, the "Debtors"), the above-captioned debtors and debtors-in-possession, submit this Motion Requesting Expedited Consideration of Debtors' Agreed Motion to Modify Cash Collateral Order (the "Motion"), and in support thereof respectfully shows the Court as follows:

BACKGROUND

1. On April 27, 2020, (the "Petition Date"), the Debtors filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101–1330 (as amended, the "Code").

2. On April 27, 2020, the Debtors filed their Motion for Interim and Final Orders Authorizing Debtor to Use Cash Collateral and Granting Adequate Protection to Pre-Petition Lender [Dckt 2] (“Debtors’ Cash Collateral Motion”). The Court entered a Third Interim Order Authorizing Debtor to Use Cash Collateral and Granting Adequate Protection to Pre-Petition Lender on November 5, 2020 [Dckt 84].

3. In Debtors’ Agreed Motion to Modify Cash Collateral Order (the “Underlying Motion”), Debtors agree to extending secured creditor McLeod Oil’s Existing Option Exercise Date, provided the estate is compensated for the additional time, the Existing Loan Maturity Date is likewise extended, and the Debtors’ rights to the use of cash collateral continue. Debtors seek a final order authorizing the continued use of cash collateral under the existing terms and approving the proposed First Amendment to Option Agreement and the Third Loan Modification Agreement attached to the Underlying Motion respectively as Exhibits B and C.

RELIEF REQUESTED

4. Debtors request expedited consideration of Debtors’ Agreed Motion to Modify Cash Collateral Order.

PRAYER

WHEREFORE, premises considered, Debtors respectfully request that the Court grant their request and set Debtors’ Agreed Motion to Modify Cash Collateral Order at its earliest convenience.

Dated: December 4, 2020

Respectfully submitted,

By: /s/ Ronald J. Smeberg
RONALD J. SMEBERG
State Bar No. 24033967
THE SMEBERG LAW FIRM, PLLC
4 Imperial Oaks
San Antonio, Texas 78248
210-695-6684 (Tel)
281-754-4042 (Fax)
ron@smeberg.com
ATTORNEY FOR DEBTORS

CERTIFICATE OF CONFERENCE

I hereby certify that on December 3rd, 2020, I conferenced with Laura Worsharm, and McLeod Oil is unopposed to the Motion.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2020, true and correct copies of the foregoing motion will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

SERVICE LIST

DEBTOR

KrissJenn Ranch, LLC
410 Spyglass Rd
Mc Queeney, TX 78123-
3418

Office of the UST
615 E Houston, Room 533
PO Box 1539
San Antonio, TX 78295-
1539

Internal Revenue Services
Special Procedures Branch
300 E. 8th St. STOP 5026
AUS
Austin, TX 78701

**GOVERNMENT
ENTITIES**

U.S. Attorney
Attn: Bkcy Division
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

Texas Comptroller of Public
Account
Attn: Bankruptcy

P.O. Box 149359
Austin, TX 78714-9359

Angelina County Tax
Assessor
606 E Lufkin Ave,
Lufkin, Texas 75901

Nacogdoches County Tax
Assessor Collector
101 West Main Street
Nacogdoches, Texas 75961

Rusk County
202 N Main St,
Henderson, Texas 75652

Shelby County, Tax Collector
200 St. Augustine St.
Center, Texas 75935

Tenaha ISD Tax Assessor-
Collector
138 College St
Tenaha, TX 75974-5612

Uvalde Tax Assessor
Courthouse Plaza, Box 8
Uvalde, Texas 78801

NOTICE PARTIES

METTAUER LAW FIRM
c/o April Prince
403 Nacogdoches St Ste 1
Center, TX 75935-3810

Albert, Neely & Kuhlmann
1600 Oil & Gas Building
309 W 7th St
Fort Worth, TX 76102-6900

Laura L. Worsham
JONES, ALLEN &
FUQUAY, LLP
8828 Greenville Ave.
Dallas, Texas 75243

Craig Crockett
CRAIG M. CROCKETT, PC

5201 Camp Bowie Blvd.
#200
Fort Worth, Texas 76107

Christopher S. Johns
JOHNS & COUNSEL PLLC
14101 Highway 290 West,
ste 400A
Austin, Texas 78737

Timothy Cleveland
CLEVELAND/TERRAZAS
PLLC
4611 Bee Cave Road, ste
306B
Austin, Texas 78746

Andrew R. Seger
KEY TERRELL & SEGER
4825 50th Street, ste A
Lubbock, Texas 79414

SECURED CREIDITORS

McLeod Oil, LLC
c/o John W. McLeod, Jr.
700 N Wildwood Dr
Irving, TX 75061-8832

UNSECURED CREIDITORS

Bigfoot Energy Services
312 W Sabine St
Carthage, TX 75633-2519

C&W Fuels, Inc.
Po Box 40
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza
755 E Mulberry Ave Ste 500
San Antonio, TX 78212-3135

Granstaff Gaedke & Edgmon
5535 Fredericksburg Rd Ste
110
San Antonio, TX 78229-3553

Hopper's Soft Water Service
120 W Frio St

Uvalde, TX 78801-3602

Larry Wright
410 Spyglass Rd
Mc Queeney, TX 78123-
3418

Medina Electric
2308 18th St.
Po Box 370
Hondo, TX 78861-0370

Medina's Pest Control
1490 S Homestead Rd
Uvalde, TX 78801-7625

Texas Farm Store
236 E Nopal St
Uvalde, TX 78801-5317

Uvalco Supply
2521 E Main St
Uvalde, TX 78801-4940

Longbranch Energy
c/o DUKE BANISTER
RICHMOND
Po Box 175
Fulshear, TX 77441-0175

DMA Properties, Inc.
896 Walnut Street at US 123
BYP
Seneca, SC 29678